

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BIS Advanced Software Systems, Ltd.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-11960-RWZ
)	
Red Bend Software, Inc., <i>et al</i> ,)	
)	
Defendants.)	
)	

MOTION FOR LEAVE TO FILE REPLY BRIEF
IN SUPPORT OF PLAINTIFF'S MOTION FOR RECONSIDERATION

Pursuant to Local Rule 7.1(B)(3), the Plaintiff BIS Advanced Software Systems, Ltd. (hereinafter, "Plaintiff") moves for leave to file "Plaintiff's Reply in Support of Plaintiff's Motion for Reconsideration," submitted herewith as Exhibit A, in reply to "Red Bend's Response to BIS's Motion for Reconsideration," filed by the Defendants Red Bend Software, Inc. and Red Bend Ltd. (hereinafter, "Red Bend") on or about May 5, 2006.

In support of this motion, Plaintiff states as follows:

1. The Reply is necessary to respond to the Proposed Order of Dismissal made by Red Bend in its Opposition.
2. As explained in the Reply, the competing covenants proposed by the Plaintiff and Defendants are nearly identical. Moreover, the parties also were very close to settling this litigation. The Reply, therefore, will assist the Court in resolving Plaintiff's Motion for Reconsideration.
3. Allowance of this motion will not prejudice the Defendants.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff leave to file the Reply, which is attached hereto as Exhibit A.

Respectfully submitted,

BIS ADVANCED SOFTWARE SYSTEMS, LTD.

By its attorneys,

/s/ Scott McConchie

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